

1 S. BRENT VOGEL
Nevada Bar No. 6858
2 Brent.Vogel@lewisbrisbois.com
ETHAN M. FEATHERSTONE
3 Nevada Bar No. 11566
Ethan.Featherstone@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
TEL: 702.893.3383
6 FAX: 702.893.3789
*Attorneys for Defendants Wellpath, Ebony-
7 Michelle Garner, Shawn Mapleton, M.D., Regina
Elizondo, Francis Boddie-Small, Virgilio Padilla,
8 Vicky Morgan, James Tenney, M.D., Michelle
Fernandez, Ashley Nicole Phillips, Nicole A.
9 Thomson, and Lovella A. Pongan*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA
12

13 MARIAN BLUE, individually, and as Special
Administrator of the Estate of STEPHEN
14 BURRELL; LISA L. CARROLL on behalf of
her wards SMB, and SFB, individually,

15
16 Plaintiffs,

17 vs.

18 CITY OF LAS VEGAS, a political
subdivision of the State of Nevada;
19 MICHELE FREEMAN, Former Chief of City
of Las Vegas Department of Public Safety, in
her official and individual capacities;
20 ROBERT STRAUBE, Deputy Chief of
Detention Services for City of Las Vegas
Department of Public Safety, LIEUTENANT
21 SHARON MEADS, LIEUTENANT CESAR
LANDROVE, LIEUTENANT VENUS
22 THOMPSON, LIEUTENANT DANIELLE
DAVIS, in their official and individual
23 capacities; WELLPATH CARE, F/K/A
CORRECT CARE SOLUTIONS,
24 individually; OFFICER DORADO,
individually; OFFICER D. CHAPARRO,
25 individually; OFFICER M. WASHINGTON,
individually; SGT M. PARKER, individually;
26 SGT. C. SMITH, individually; SGT. WEDIG,
27
28

Case No.: 2:21-cv-00372-RFB-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO PLAINTIFF'S MOTION
FOR SANCTIONS**

(FIRST REQUEST)

1 individually; SHAWN MAPLETON,
 2 individually; MICHAEL POPOV,
 3 individually; FRANCES BODDIE-SMALL,
 4 individually; EBONYMICHELLE D.
 5 GARNER, individually; PSYCH RN DEE,
 6 individually; REGINA ELIZONDO,
 7 individually, and DOES 1-35, inclusive all of
 8 whom are sued in their individual capacities,
 9
 10 Defendants.

11 IT IS HEREBY STIPULATED AND AGREED BETWEEN PLAINTIFFS MARIAM
 12 BLUE, INDIVIDUALLY, AND AS SPECIAL ADMINISTRATOR OF THE ESTATE OF
 13 STEPHEN BURRELL; LISA L., CARROLL on behalf of her wards, SMB and SFB, individually
 14 (“Plaintiffs”); Defendants CITY OF LAS VEGAS; LIEUTENANT DANIELLE DAVIS;
 15 LIEUTENANT MATTHEW TRIPLETT; OFFICER RICHARD DORADO; OFFICER
 16 D’ANGELO CHAPARRO-WILSON; OFFICER MAURICE WASHINGTON; SERGEANT
 17 MARCOS PARKER; SERGEANT CHARLES SMITH; SERGEANT JOHN WEDIG;
 18 SERGEANT J. SCHROYER; SERGEANT L. HOLMES; OFFICER A. ELIASON; OFFICER
 19 TRAVIS RAZ; OFFICER DAMON MILLETT; SERGEANT BLEDSOE (“City Defendants”); and
 20 Defendants WELLPATH, LLC F/K/A CORRECT CARE SOLUTIONS, LLC; SHAWN
 21 MAPLETON; MICHAEL POPOV; VIRGILIO PADILLA; FRANCIS BODDIE-SMALL;
 22 EBONYMICHELLE D. GARNER; DEE MORGAN, aka Vicky Morgan; REGINA ELIZONDO;
 23 DOCTOR STILL; JAMES TENNEY; NICOLE ASHLEY THOMSON; MICHELLE
 24 FERNANDEZ; LOVELLA A. PONGAN; ASHLEY NICOLE PHILLIPS (“Wellpath
 25 Defendants”), by and through their counsel of record, that the deadline for Wellpath Defendants to
 26 respond to Plaintiffs’ Motion for Sanctions be extended by six calendar days from the current
 27 deadline of December 16, 2022. **The new deadline will be December 22, 2022.** Wellpath needs
 28 additional time to prepare supporting stipulations to its motions since some staff are not available
 due to the holidays.

///

///

IT IS SO STIPULATED.

DATED this 19th day of December, 2022.

DATED this 19th day of December, 2022.

LEWIS BRISBOIS BISGAARD & SMITH
LLP

PETER GOLDSTEIN LAW CORP.

By: /s/ Ethan M. Featherstone
Ethan M. Featherstone, Esq.
Nevada Bar No. 11566
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, NV 89118
Attorney for Wellpath Defendants

By: /s/ Peter Goldstein
Peter Goldstein, Esq.
Nevada Bar No. 6992
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
Attorney for Plaintiffs

DATED this 19th day of December, 2022.

DATED this 19th day of December, 2022.

MEDICAL DEFENSE LAW GROUP

By: /s/ John A. Curtas
Bryan K. Scott, Esq.
City Attorney
Nevada Bar No. 4381
John A. Curtas, Esq.
Deputy City Attorney
Nevada Bar No. 1841
495 South Main Street, 6th Floor
Las Vegas, NV 89101
Attorneys for Defendants
City of Las Vegas, Lieutenant Danielle Davis,
Officer Richard Dorado, Officer D'Angelo
Chapparo-Wilson, Officer Maurice
Washington, Sgt. Marcos Parker, Sgt. Charles
Smith and Sgt. John Wedig

By: /s/ Paul A. Cardinale
Paul A. Cardinale, Esq.
Nevada Bar No. 8394
3800 Watt Avenue, Suite 245
Sacramento, California 95821
Attorney for Defendants
Michael Popov, D.O. and Jonathan Still, M.D.

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 20th day of December, 2022.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2022, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S MOTION FOR SANCTIONS (FIRST REQUEST)** with the Clerk of Court for the United States District Court, and served the registered user participants in the case, by using the Court's CM/ECF system.

Peter Goldstein, Esq.
PETER GOLDSTEIN LAW CORP.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
Email: peter@petergoldsteinlaw.com
Attorney for Plaintiffs

Bryan K. Scott, Esq.
City Attorney
Nevada Bar No. 4381
John A. Curtas, Esq.
Deputy City Attorney
Nevada Bar No. 1841
495 South Main Street, 6th Floor
Las Vegas, NV 89101
Email: jacurtas@lasvegasnevada.gov
Attorneys for Defendants
City of Las Vegas, Lieutenant Danielle Davis, Officer Richard Dorado, Officer D'Angelo Chapparo-Wilson, Officer Maurice Washington, Sgt. Marcos Parker, Sgt. Charles Smith and Sgt. John Wedig

Paul A. Cardinale, Esq.
Nevada Bar No. 8394
3800 Watt Avenue, Suite 245
Sacramento, California 95821
Email: paul.cardinale@med-defense.com
Attorney for Defendants
Michael Popov, D.O. and Jonathan Still, M.D

/s/ Gaylene Kim-Mistrille
An employee of
Lewis Brisbois Bisgaard & Smith LLP